

US EPA ARCHIVE DOCUMENT

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August 9th, 2011

Mr. Ralph Dollhopf
Federal On-Scene Coordinator and Incident Commander
U.S. Environmental Protection Agency
801 Garfield Avenue, #229
Traverse City, MI 49686

Dear Mr. Dollhopf:

On June 17, 2011 Enbridge received a directive from the U.S. EPA to complete oil recovery of all submerged oil, oil sheen, oil-containing soils and oil-containing sediments by August 31, 2011. As we work towards completing this directive it is becoming more apparent that several factors have impeded our ability to meet this goal. These include, but are not limited to:

- Expanded scope. At the time of the directive was written, reassessment of Morrow Lake and the delta area had not yet been completed. Upon completion it was discovered that these areas contained more submerged oil than expected and over a much larger area.
- Dynamics of the River. The location and quantity of submerged oil at individual sites have changed since the initial reassessment and require additional assessments to redefine the work areas. Additionally, all sections of the river will require a quality assessment and potential spot rework to ensure quality standards are being met.
- Transition to a mechanized approach to the cleanup. Movement toward more mechanization has increased our efficiencies as well as reduced our reliance on manual labor which can be heavily impacted by summer heat conditions. However, many of the tools being used have been specially designed in-house and require local fabrication which has proven to be time consuming. Additionally, some specialized pieces of equipment such as marsh buggies are in high demand and the supply within North America has been completely depleted.
- Permitting. While every effort has been made to apply for permitting in advance of recovery operations, the process often has elements which cannot be foreseen and delay our ability to perform remedial work.
- Environmental factors. Impacts to productivity associated with heat, inclement weather, changing river levels, dissolved oxygen issues, and turbidity.

We believe that our approach to the work has been well thought out and will achieve the desired results provided we adhere to the upstream to downstream philosophy and do not sacrifice quality to meet a deadline. We therefore ask that the aforementioned be considered in open dialog with the U.S. EPA to potentially extend the August 31, 2011 deadline or to develop a quality metric as our goal.

The challenge of mitigating the submerged oil has been described as "unprecedented". We have continued to collaborate with the state and federal agencies to insure the ongoing cleanup is of high quality and minimizes environmental impact.

Sincerely,

A handwritten signature in black ink, appearing to read "Rich Adams", written in a cursive style.

Rich Adams

Cc: Jeff Kimble
Tricia Edwards
Steve Wolfe
Mike Alexander
Mark Ducharme